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Rod R. Blagojevich, Governor

Sam Flood, Acting Director

January 26, 2009

Mr. Harold Denhan Village President Village of Pontoon Beach 1 Regency Parkway Pontoon Beach, IL 62040-6742

Mr. Richard Jones Sherrill Associates, Inc. 116 West Street Edwardsville, IL 62025

RE: Gasa Industrial Center, Pontoon Beach, Madison County Endangered Species Consultation Program Natural Heritage Database Review # 09-01095

Dear Mr. Denham and Mr. Jones:

This letter concerns the Endangered Species Consultation for this project located in Township 3 North, Range 9 West, Section 14 submitted by Sherrill Associates in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075.

The proposed action has been platted for development of a 13.5 acre industrial business to be subdivided into 6 lots. The project is located off Illinois Route 111, southwest of the intersection of Route 111 and Horseshoe Lake Road, and east of Horseshoe Lake. This project is located within the vicinity of records for the State-listed threatened **Least Bittern**, *Ixobrychus exilis*, and **Common Moorhen**, *Gallinula chloropus*.

As a response to the Department's open consultation letter, Mr. Jones submitted a cover letter and preliminary plat of development on October 22, 2008. The Department has completed its review of the project and determined that the action is likely to have adverse impact on the listed species. The Department recommends that the following measures be implemented by the developer and incorporated in the Village's project authorization; consultation remains open. Additional recommendations may be made once more information is received.

Water Quality and Quantity Issues

- 1. The Department is concerned about potential adverse impacts to Least Bittern and Common Moorhen records near this project from increased stormwater runoff (from an increase in impervious surfaces) and increased levels of road salt and chemicals from vehicles and parking lots. These birds can be negatively impacted during their breeding season if water levels increase and drown out their nesting attempts. The Department requests clarification on the direction of stormwater releases after the water reaches the Route 111 drainage ditch, since it appears from information provided that post construction volumes will be three times that of current release volumes.
- 2. The Department is also very concerned that fields south of this site, which are located on IDNR property, will become flooded from stormwater being released from Gasa's detention basins and then routed to the drainage ditch along Route 111. Please note that the Department owns property west and south of this parcel (Horseshoe Lake), therefore, Best Management Practices (BMP) should be incorporated into design plans to avoid impacts to Horseshoe Lake.
- 3. The Department recommends that stormwater treatment systems incorporate a treatment train of BMPs including oil/grit separators at the storm drains, wet bottom detention basin(s), and vegetative swales placed before and after detention basins (planted with native, non-invasive species).
- 4. Native vegetation/landscaping, as opposed to turf grass, is recommended within and surrounding the detention basins. Not only will native landscaping aid in pollutant adsorption, but it will stabilize the soil, reduce soil erosion, reduce the need for fertilizers and pesticides, and will dissuade Canadian Geese from congregating near the basins.
- 5. Road salt coming off tires and vehicles entering the parking lot, and salt applied directly to the parking lot, are water quality concerns for the swales, detention basin and wetlands nearby. The Department recommends that non-saline deicers, and methods to use less salt, be investigated as alternatives.

Please contact me if you have questions regarding this consultation review.

Sincerely,

Kathi Davis Impact Assessment Section Division of Ecosystems & Environment Ph: (217) 557-0483 Fax (217) 524-4177 Kathi.davis@illinois.gov

enclosure

Cc: Mark Phipps, IDNR/Region IV Scott Flood, IDNR/Region IV Kent Boyles, IDNR/District 23 Debbie Scott Newman, INPC